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19
20 UNITED STATES DISTRICT COURT
21 DISTRICT OF NEVADA

22 UNITED STATES OF AMERICA

23 Plaintiff,

24 v.

25 Case No. 2:16-cr-00100-GMN-CWH

26 JAN ROUVEN FUECHTENER,

27 Defendant.

28
29 **OPPOSED MOTION FOR EXTENSION OF TIME TO FILE**
30 **RESPONSE**

31
32 Defendant, Jan Rouven Fuechtener (“Fuechtener”), by and through his
33 undersigned counsel, respectfully moves for an extension of time until March 10,
34 2020, in which to submit his response in opposition or any objections to the
35 proposed final order of forfeiture. Fuechtener is meeting in person with counsel of
36

1 record on March 6, 2020, to discuss this matter and properly respond. Due to
2 Fuechtener's current incarceration it was impossible for counsel to adequately
3 discuss this matter with Fuechtener prior to the March 2nd deadline.

4 Fuechtener is aware that the Court generally discourages requests for
5 extensions of time. However, Fuechtener is seeking the additional 8 days in order to
6 properly respond to the proposed order with adequate client input.

7 Wherefore, the Court should grant this Motion to allow Fuechtener an
8 extension of time to and including March 10, 2020, in which to file his reply.

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10 Respectfully submitted,

11 /s/ Lance J. Hendron
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24 Counsel *Pro Hac Vice* for Jan Fuechtener

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 10th day of March 2020, via CM/ECF on all counsel of record.

/s/ Zachary L. Newland
Zachary L. Newland

CERTIFICATE OF CONFERENCE

Prior to the filing of this motion I hereby certify that I conferred with opposing counsel to ascertain their position on the merits of the relief sought herein. Counsel for the United States informed the undersigned that the United States is opposed to the Court granting Fuechtener any extension of time.

/s/ Zachary L. Newland
Zachary L. Newland